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Petition For Import Eligibility Determination

IAW 49 CFR 593.5 (A) (1)

January 10, 2002

Administrator
O.V.S.C.
National Highway Traffic Safety Administration
Room 6111
400 7th St., S.W.
Washington, DC. 20590
Attn.: NEF-32 Import Eligibility

JHTSA

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Dear Mr. George Entwistle,

The following is the basis for this petition:

Part 593.6(a) (1)

The vehicle for which a determination is sought is the 2001 - 2002 SL Mercedes Benz. We have examined the recall campaigns available to us from N.H.T.S.A. and have not found any listings for these vehicles in the current data available. However, all vehicle reports will have a recall campaign search included with them at the time of submission.

Part 593.6(a) (2)

The vehicle which is substantially similar to the petition vehicle is the US version.

Part 593.6(a) (3)

The vehicle which we believe to be substantially similar is manufactured for sale in the USA and it was certified to meet all applicable Federal Motor Vehicle Safety Standards ("FMVSS") in effect at the time of manufacture. The non-conforming model was not listed on the accepted DOT list in 55 FR 219, pp219,

47418ff, or the updates that have been published. The differences between the USA model and the non-certified model are very minor and have been outlined in this petition.

Part 593.6(a) (4)

Since a USA companion model exists, we seek your determination that our petition vehicle is substantially similar to the USA model and therefore is eligible for importation and modification in the "substantially similar" category. We have examined the printed text from the dealers both in the USA and in Europe and we have compared the parts lists from Europe and the USA to determine both what differences exist and what parts will be necessary to bring our non-conforming model into conformance with all applicable FMVSS in effect at the time of manufacture. These differences and changes have been outlined in the following examination of each applicable FMVSS.

Part 593.6(a) (5)

The following outline will show that our non-conforming vehicle was originally manufactured to conform to the FMVSS in many areas in the same manner as its U.S. companion model, many of the concerned parts have the same parts numbers as the USA model. In all areas that have to be modified the parts will be supplied by the OEM manufacturer. The modifications to this vehicle do not concern the basic structure; only easily removable and available parts.

FMVSS 101

The Instrument cluster must be changed to the US part and the Cruise Control lever must be changed to meet this FMVSS. With these changes this vehicle will now meet the requirements of this FMVSS.

FMVSS 102

The markings, starter interlock, shifting pattern, and brake effect are identical to those in the U.S. model.

FMVSS 103

The windshield defogging and defrosting systems are identical to those in the U.S. model.

FMVSS 104

The windshield wiping and washing systems are identical to those in the U.S. model.

FMVSS 105 & FMVSS 135

The hydraulic brake system and the parking brake system are identical to those in the U.S. model.

FMVSS 106

The brake hoses are identical to those in the U.S. model.

FMVSS 108

The following modifications must be made to fully meet this FMVSS:

- a. Install U.S. model headlamps and front sidemarker lights.
- b. Install U.S. model taillamp assemblies which incorporate rear sidemarker lights.

FMVSS 109

This vehicle came equipped with tires that bare the "DOT" symbol.

FMVSS 110

A tire placard must be installed to meet this FMVSS requirement.

FMVSS 111

The driver's inside and outside rearview mirrors meet this FMVSS. However, the passenger's rearview outside mirror must be changed to the U.S. companion model part to meet the requirements. See Attachment (Mirror part#) or be etched to read the appropriate language.

FMVSS 113

The hood latch system is identical to the one used on the U.S. model.

FMVSS 114

These cars must be reprogrammed to activate these warning systems. With this change this vehicle is now in compliance with this FMVSS.

CFR 541

This vehicle is not a “high line” car. However, the parts are marked as specified.

CFR 565

A “Vehicle Identification Plate” must be added near the left windshield post and a reference and certification label must be added in the left front door post area to meet this FMVSS. Copies of all labels will be included in the final report.

FMVSS 116

The vehicle came equipped with DOT brake fluid and the top of the master cylinder is labeled with the DOT information.

FMVSS 118

These systems are identical to the US vehicle.

FMVSS 124

The accelerator control system is identical to the U.S. model.

FMVSS 201

The components subject to this FMVSS are identical to those in the U.S. companion model.

FMVSS 202

This vehicle came equipped with head restraints that are identical to those on the U.S. model.

FMVSS 203

N/A when FMVSS 208 is met. Conforms to S5.1 of FMVSS 208. Impact for steering controls systems.

FMVSS 204

The steering shaft on this vehicle are energy absorbing and is identical to that used on the U.S. model.

FMVSS 205

The glass and glazing materials used on this vehicle are identical to those used on the U.S. model. They are clearly labeled with DOT AS-1 or DOT AS-2.

FMVSS 206

The door locks and retention components are identical to the USA model.

FMVSS 207

The seating system in this vehicle is identical to that used in the U.S. model.

FMVSS 208

This vehicle is equipped with a seat belt warning lamp that is identical to that used on the U.S. model. The passive restraint systems used in these vehicles consist of dual front airbags and knee bolsters. They also have combination lap and shoulder belts at the out board front seating positions. These manual systems are automatic, self tensioning and are released by means of a single red push-button. They are controlled by the Airbag control computer.

All vehicles entering the U.S.A. must be inspected to confirm that the systems bare the U.S. part # on the airbags (Part# - See Attachment), control unit (part#- See Attachment), sensors and seatbelts and that the knee bolster (part#-See Attachment) has been installed. Some parts coming from European countries may need to be changed due to varying regulations. However, Gulf states vehicles have U.S. systems as standard equipment.

FMVSS 209

The seatbelt labels are identical to those on the U.S. model and they meet this FMVSS requirement.

FMVSS 210

The seatbelt anchorages are identical to those of the U.S. model.

FMVSS 212

The windshield intrusion zone and the parts and engineering thereof are identical to those of the U.S. model.

FMVSS 214

Doorbars in this vehicle are identical to those in the USA model. All vehicles that enter the country must be inspected for compliance with this regulation due to varying standards throughout European communities. The side impact air bags are standard equipment and are identical to the US models.

49 CFR 581 or FMVSS 215

The bumpers and the support structure for the bumpers on these vehicles are identical to the U.S. model.

FMVSS 216

The body of this vehicle is identical to that of the U.S. model.

FMVSS 219

The windshield intrusion and the parts or components thereof, are identical to those of the U.S. model.

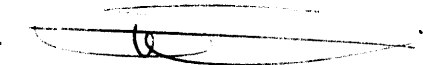
FMVSS 301

The fuel system in this vehicle is identical to that of the U.S. model. Fuel spillage problems are controlled by the evaporative system that was installed by the factory for the EPA requirements. These evaporative systems have a rollover and check valve incorporated in their design. These systems are controlled by the ORVR and Spitback system which are part of the emissions systems.

FMVSS 302

This vehicle is equipped with interior materials that are identical to those used on the U.S. model.

Thank you for your attention,
J.K. Technologies, L.L.C.



By: Jonathan Weisheit, President